

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
NESSA RISLEY, individually and on behalf of :
all others similarly situated, :
Plaintiff, :
v. : 1:22-cv-02780-KPF
UNIVERSAL NAVIGATION INC. d/b/a :
UNISWAP LABS, HAYDEN Z. ADAMS, :
PARADIGM OPERATIONS LP, AH CAPITAL :
MANAGEMENT, L.L.C. d/b/a ANDREESSEN :
HOROWITZ, and UNION SQUARE :
VENTURES, LLC, :
Defendants.
----- X

**STIPULATION AND ORDER SETTING DEADLINES FOR FILING OF
AMENDED COMPLAINT AND DEFENDANTS' RESPONSE**

WHEREAS, on April 4, 2022, Nessa Risley ("Plaintiff"), individually and on behalf of all others similarly situated, filed a class action complaint against Universal Navigation Inc. d/b/a Uniswap Labs, Hayden Z. Adams, Paradigm Operations LP, AH Capital Management, L.L.C. d/b/a Andreessen Horowitz, and Union Square Ventures, LLC (collectively, "Defendants") in the above-captioned case alleging violations of the Securities Act of 1933 and the Securities Exchange Act of 1934;

WHEREAS, the action is subject to the Private Securities Litigation Reform Act of 1995 (the "PSLRA");

WHEREAS, the Court previously ordered the parties to confer and submit a proposed schedule for the filing of a consolidated or amended complaint and Defendants' response thereto

within 15 days after a lead plaintiff has been appointed and lead counsel approved by the Court in accordance with the PSLRA (Dkt. No. 21);

WHEREAS, the Court entered an Order Appointing Lead Plaintiffs and Approving Selection of Co-Lead Counsel on July 29, 2022 (Dkt. No. 40);

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by counsel for the parties listed below, that:

1. Plaintiff shall file an amended complaint on or before **September 26, 2022**.
2. Defendants shall move or otherwise respond to the amended complaint on or before **October 26, 2022**.
3. To the extent any Defendant files a pre-motion letter in accordance with Rule 4.A of the Court's Individual Rules of Practice, any responsive correspondence from Lead Plaintiffs shall be filed on or before **October 31, 2022**.
4. By entering into this stipulation, Defendants do not waive any defenses that otherwise could be asserted through a motion pursuant to Fed. R. Civ. P. 12 or otherwise.

Dated: New York, New York
August 15, 2022

/s/ James R. Serritella
KIM & SERRITELLA LLP
James R. Serritella (jserritella@kandslaw.com)
Aram M. Boghosian (aboghosian@kandslaw.com)
110 W. 40th Street, 10th Floor
New York, NY 10018
Telephone: (212) 951-1230

/s/ Christopher J. McNamara
BARTON LLP
Roger E. Barton (rbarton@bartonesq.com)
Christopher J. McNamara (cmcnamara@bartonesq.com)
Michael C. Ward (mward@bartonesq.com)
711 Third Avenue, 17th Floor
New York, NY 10017
Telephone: (212) 687-6262

Attorneys for Lead Plaintiffs

Dated: New York, New York
August 15, 2022

/s/ Maeve O'Connor
DEBEVOISE & PLIMPTON LLP
Maeve L. O'Connor (moconnor@debevoise.com)
Elliot Greenfield (egreenfield@debevoise.com)
919 Third Avenue
New York, NY 10022
Telephone: (212) 909-6000

*Attorneys for Defendants Universal Navigation, Inc.,
Hayden Z. Adams and Union Square Ventures, LLC*

Dated: New York, New York
August 15, 2022

/s/ Benjamin A. Naftalis
LATHAM & WATKINS LLP
Susan E. Engel (susan.engel@lw.com)
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004-1304
Telephone: (212) 637-2200

Benjamin A. Naftalis (benjamin.naftalis@lw.com)
Douglas K. Yatter (douglas.yatter@lw.com)

1271 Avenue of the Americas
New York, NY 10020
Telephone: (212) 906-1200

Attorneys for Defendant AH Capital Management, L.L.C.

Dated: New York, New York
August 15, 2022

/s/ Alexander C. Drylewski
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Alexander C. Drylewski
(alexander.drylewski@skadden.com)
Tansy Woan (tansy.woan@skadden.com)
One Manhattan West
New York, NY 10001-8603
Telephone: (212) 735-2129

Attorneys for Defendant Paradigm Operations LP

SO ORDERED this 16th day of August, 2022.



THE HONORABLE KATHERINE POLK FAILLA
United States District Judge